

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

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UNITED STATES OF AMERICA, and  
STATE OF MARYLAND, MARYLAND  
DEPARTMENT OF THE ENVIRONMENT,

Plaintiffs,

v.

C. A. Nos. JFM-97-558 and  
JFM-97-559

BETHLEHEM STEEL CORPORATION,

Defendant.

**STIPULATED ORDER IMPLEMENTING  
MODIFICATIONS TO CONSENT DECREE**

WHEREAS, Plaintiffs, the United States of America ("United States"), on behalf of the United States Environmental Protection Agency ("EPA"), and the State of Maryland, Maryland Department of the Environment, and Defendant, Bethlehem Steel Corporation ("Bethlehem"), entered into a Consent Decree in the above-captioned action regarding alleged environmental violations and conditions at Bethlehem's Sparrows Point facility in Maryland ("Sparrows Point Facility");

WHEREAS, this Court entered the Consent Decree as a final judgment on October 8, 1997;

WHEREAS, Section XXXI, Paragraph 1 of the Consent Decree provides that modifications to the Consent Decree can be made by agreement of the United States, Maryland and Bethlehem in writing and filed with the Court;

WHEREAS, Paragraph XXXIV, Paragraph 2 requires that, in the event of any transfer, in whole or in part, of the areas of the Sparrows Point Facility that are the subject of the Consent Decree, Bethlehem shall give notice of the Consent Decree to the transferee and shall make complete provision for the fulfillment of the Consent Decree;

WHEREAS, Bethlehem and ISG Acquisition Corp. ("ISG") entered into an agreement on March 12, 2003, by which ISG agreed, inter alia, to assume all of the ongoing obligations of the Consent Decree, as amended;

WHEREAS, ISG assumed ownership of the Sparrows Point Facility on April 30, 2003

NOW, THEREFORE, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

Effective retroactively to April 30, 2003, ISG shall be substituted for Bethlehem in all provisions of the Consent Decree where Bethlehem's name appears;

2. ISG shall not be required to comply with any provisions of the Consent Decree, as amended, with which Bethlehem already has fully and finally complied, including the payment of the civil penalty;

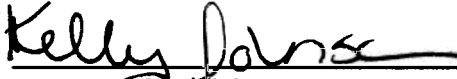
3 All other provisions of the Consent Decree, as amended, remain in full force and effect.


SO ORDERED this 1st day of August, 2005

  
\_\_\_\_\_  
U.S. District Judge

The undersigned party consents to the above-referenced modifications of the Consent Decree in the matters of United States and State of Maryland v. Bethlehem Steel Corp., C. A. Nos. JFM-97-558 and JFM-97-559 (D. Md.).

FOR THE UNITED STATES

  
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The undersigned party consents to the above-referenced modifications of the Consent Decree in the matters of United States and State of Maryland v. Bethlehem Steel Corp., C. A. Nos. JFM-97-558 and JFM-97-5559 (D. Md.).

FOR STATE OF MARYLAND, MARYLAND  
DEPARTMENT OF THE ENVIRONMENT



Title: Horacio Tablada  
Director, Waste Management Administration

The undersigned party consents to the above-referenced modifications of the Consent Decree in the matter of United States and State of Maryland v. Bethlehem Steel Corp., C.A. Nos. JFM-97-558 and JFM-97-559 (D..Md.).

FOR ISG SPARROWS POINT



VP & GM Sparrows Point

Title:

ISG Sparrows Point